

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

MOTORS LIQUIDATION COMPANY, et al.,  
f/k/a General Motors Corp., et al.,

Debtors.

Chapter 11  
Case No. 09-50026 (MG)  
(Jointly Administered)

**DECLARATION OF JAMES C. TECCE**

I, James C. Tecce, hereby declare under the penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct to the best of my knowledge, information and belief:

1. I am a partner of the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel to General Motors LLC, and a member in good standing of the bar of New York. I submit this declaration in support of the Joinder of General Motors LLC in Motors Liquidation Company GUC Trust's Objection to Plaintiffs' Motion to Enforce Unexecuted Settlement Agreement.

2. Attached hereto as Exhibit A is a true and correct copy of the Unexecuted Settlement Agreement (without exhibits) attached as Exhibit H to the Weisfelner Decl. filed at Dkt. No. 14093-8.

3. Attached hereto as Exhibit B is a true and correct copy of excerpts from Deposition of Edward Weisfelner, dated November 8, 2017.

4. Attached hereto as Exhibit C is a true and correct copy of excerpts from Deposition of William P. Weintraub, dated November 9, 2017.

5. Attached hereto as Exhibit D is a true and correct copy of excerpts from Deposition of Howard S. Steel, dated November 8, 2017.

6. Attached hereto as Exhibit E is a true and correct copy of excerpts from

Deposition of Matthew J. Williams, dated November 13, 2017.

7. Attached hereto as Exhibit F is a true and correct copy of an email and its attachments, dated June 9, 2017 from N. Moss bearing Bates numbers AG0005147 through AG0005184.

8. Attached hereto as Exhibit G is a true and correct copy of excerpts from Deposition of Keith Martorana, dated November 20, 2017.

9. Attached hereto as Exhibit H is a true and correct copy of an email chain beginning July 10, 2017 bearing Bates numbers GUC\_0003887 through GUC\_0003891.

10. Attached hereto as Exhibit I is a true and correct copy of an email and its attachments from H. Steel, dated August 11, 2017 bearing Bates numbers GUC\_0001558 through GUC\_0001791.

11. Attached hereto as Exhibit J is a true and correct copy of an email chain beginning August 3, 2017 bearing Bates numbers GUC\_0001341 through GUC\_0001350.

12. Attached hereto as Exhibit K is a true and correct copy of an email chain beginning August 14, 2017 bearing Bates numbers GUC\_0005638 through GUC\_0005642.

13. Attached hereto as Exhibit L is a true and correct copy of an email from H. Steel, dated August 16, 2017 bearing Bates number GUC\_0005630.

14. Attached hereto as Exhibit M is a true and correct copy of Motors Liquidation Company GUC Trust's Form 10-Q for the quarterly period ended June 30, 2017, dated August 14, 2017 and filed with the United States Securities and Exchange Commission on August 14, 2017, bearing Bates numbers GUC\_0010567 through GUC\_0010620.

15. Attached hereto as Exhibit N is a true and correct copy of an email and its attachments from M. Williams, dated August 16, 2017 bearing Bates numbers GUC\_0000905

through GUC\_0000908.

16. Attached hereto as Exhibit O is a true and correct copy of an email chain beginning August 16, 2017 bearing Bates numbers GUC\_0000898 through GUC\_0000899.

17. Exhibit P has been left blank intentionally.

18. Attached hereto as Exhibit Q is a true and correct copy of an email from D. Golden, dated August 14, 2017 bearing Bates number BR005531.

19. Attached hereto as Exhibit R is a true and correct copy of a letter from D. Golden to the Honorable Martin Glenn, dated August 17, 2017 [Dkt. No. 14063].

20. Attached hereto as Exhibit S is a true and correct copy of an email from R. Tennenbaum, dated August 16, 2017 bearing Bates number GUC\_0013900.

21. Attached hereto as Exhibit T is a true and correct copy of an email chain and attachments beginning July 25, 2017 bearing Bates numbers GUC\_0003459 through GUC\_0003519.

22. Attached hereto as Exhibit U is a true and correct copy of excerpts from Deposition of Beth Andrews, dated November 15, 2017.

23. Attached hereto as Exhibit V are true and correct copies of Patricia Barker's and James Bivins's Engagement Letter with Hans Berman Sobol Shapiro LLP, dated March 21, 2014 bearing Bates numbers ELPLNTFF00014245 through ELPLNTFF00014248 and ELPLNTFF00014206 through ELPLNTFF00014207.

24. Attached hereto as Exhibit W is a true and correct copy of the Ignition Switch and Non-Ignition Switch Plaintiffs' First Supplement to their Responses and Objections to the GUC Trust's First Set of Interrogatories, dated October 17, 2017.

25. Attached hereto as Exhibit X is a true and correct copy of Certain Ignition Switch

Pre-Closing Accident Plaintiffs' Supplemental Objections and Responses to the GUC Trust's First Set of Interrogatories to All Claimants, dated October 17, 2017.

26. Attached hereto as Exhibit Y is a true and correct copy of Additional Ignition Switch Pre-Closing Accident Plaintiffs' First Supplemental Objections and Responses to the GUC Trust's First Set of Interrogatories to All Claimants, dated October 20, 2017.

27. Attached hereto as Exhibit Z is a true and correct copy of Brown Rudnick LLP's Letter of Engagement with Hagens Berman Sobol Shapiro LLP, Lieff Cabraser Heimann & Bernstein, LLP, and Hilliard Muñoz Gonzalez LLP, dated October 3, 2014.

28. Attached hereto as Exhibit AA is a true and correct copy of an email chain beginning August 3, 2017 bearing Bates numbers BR000001 through BR000009.

29. Attached hereto as Exhibit BB is a true and correct copy of an email chain beginning August 9, 2017 bearing Bates numbers GUC\_0005846 through GUC\_0005847.

30. Attached hereto as Exhibit CC is a true and correct copy of an email chain beginning August 3, 2017 bearing Bates numbers GUC\_0001904 through GUC\_0001927.

31. Attached hereto as Exhibit DD is a true and correct copy of an email chain beginning August 3, 2017 bearing Bates numbers GUC\_0001792 through GUC\_0001816.

32. Attached hereto as Exhibit EE is a true and correct copy of an email chain beginning August 14, 2017 bearing Bates numbers BR006032 through BR006033.

33. Attached hereto as Exhibit FF is a true and correct copy of emails from M. Williams, dated August 16, 2017 bearing Bates number GUC\_0000904.

34. Attached hereto as Exhibit GG is a true and correct copy of an email chain beginning August 16, 2017 bearing Bates numbers GUC\_0000888 through GUC\_0000890.

35. Attached hereto as Exhibit HH is a true and correct copy of excerpts from

Deposition of Daniel Golden, dated November 16, 2017.

36. Attached hereto as Exhibit II is a true and correct copy of an email chain beginning July 10, 2017 bearing Bates numbers GUC\_0004498 through GUC\_0004503.

37. Attached hereto as Exhibit JJ is a true and correct copy of an email chain beginning August 16, 2017 bearing Bates numbers GUC\_0013946 through GUC\_0013949.

38. Attached hereto as Exhibit KK is a true and correct copy of excerpts from Deposition of Melanie Mosley, dated November 22, 2017.

39. Attached hereto as Exhibit LL is a true and correct copy of excerpts from Deposition of James Barton, dated November 22, 2017.

40. Exhibit MM has been left blank intentionally.

41. Attached hereto as Exhibit NN is a true and correct copy of an excerpt from the transcript of the August 11, 2017 Status Conference held before the Honorable Jesse M. Furman in the Southern District of New York in MDL 2543.

42. Attached hereto as Exhibit OO is a true and correct copy of an excerpt from the transcript of the August 17, 2017 Court Conference held before the Honorable Martin Glenn in this action.

Dated: November 28, 2017

By: /S/ JAMES C. TECCE  
Name: James C. Tecce